


Application granted.

SO ORDERED.


NAOMI REICE BUCHWALD
UNITED STATES DISTRICT JUDGE

ERTMAN
DULIS &
HELISEK^{PLLC}

Dated: New York, New York
December 20, 2022

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December 19, 2022

VIA ECF

Honorable Naomi Reice Buchwald
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: Polcom USA, LLC (“Polcom”) v. Affiliated FM Insurance Company (“AFM”), 1:20-cv-9206-NRB; M. A. Mortenson Company (“Mortenson”) v. Zurich American Insurance Company (“Zurich”), 1:22-cv-0092-NRB

Dear Judge Buchwald:

Pursuant to the Parties’ Stipulated Confidentiality and Protective Order (Dkt. 63) (“Confidentiality Order”), Your Honor’s Individual Practices Rule 2(H), the Court’s standing order, 19-mc-00583, and the Court’s ECF Rules & Instructions, section 6, we write on behalf of Polcom and respectfully move this Court for permission to file under seal, with Viewing Level Selected Parties, Polcom’s Reply to Zurich’s Opposition to Polcom’s Motion for Partial Summary Judgment on Phase I Coverage Issues. Pursuant to the Confidentiality Order, Polcom respectfully requests permission to file the above described document under seal because it describes documents designated by producing parties to the above-captioned actions as “Confidential Material” under the Confidentiality Order.

The proposed letter and exhibits to be filed under seal will be filed electronically in accordance with Your Honor’s Individual Practices and the Court’s ECF Rules & Instructions, section 6, and contemporaneously with the filing, courtesy copies will be mailed to Chambers pursuant to Your Honor’s Individual Practices Rule 2(H)(2).

Plaintiff respectfully requests this Court grant it permission to file the documents described above under seal as required by the Confidentiality Order.

Respectfully submitted,

ERTMAN DULIS & HELISEK PLLC

By: /s/ John C. Ertman
Counsel for Plaintiff Polcom USA, LLC

cc: Counsel of Record, *via* PACER